

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RAJEEV PAHUJA,

Index #11 Civ. 4607(PAE)

Plaintiff

-v-

AMERICAN UNIVERSITY OF ANTIGUA c/o GREATER
CARIBBEAN LEARNING RESOURCES,

**AFFIRMATION OF
LEONARD A. SCLAFANI, ESQ.
IN OPPOSITION TO MOTION
FOR EXTENSION OF TIME TO
ANSWER DEFENDANT'S MOTION
TO DISMISS**

Defendant

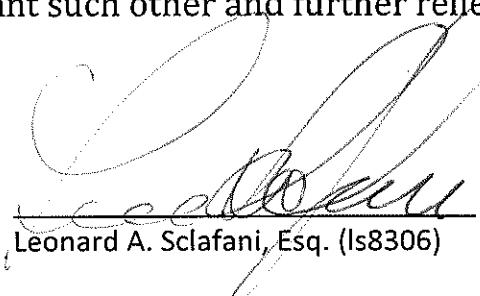
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Leonard A. Sclafani, Esq. hereby affirms under penalty of perjury as follows:

1. I am an attorney duly admitted to practice before this Court. I am a member of the firm of Leonard A. Sclafani, P.C., attorneys for defendant American University of Antigua (hereinafter "AUA") herein. As such, I am fully familiar with all of the facts and circumstances surrounding this matter and hereinafter set forth.
2. I submit this affirmation in opposition to what appears to be the motion of plaintiff for an extension of time to respond to defendant American University of Antigua's pending motion to dismiss plaintiff's complaint.
3. Plaintiff claims that he needs the extension because he has been "diagnosed with a severe disability (Attention Deficit Disorder)" and "will not be able to do an opposition motion to dismiss in fourteen days."

4. Plaintiff states that he received defendant's motion on June 23, 2012. The motion was mailed to plaintiff on June 15, 2012. Inasmuch as it does not take 8 days for mail delivery from Manhattan to Hamden, Connecticut, where plaintiff resides, a serious issue exists as to the veracity of plaintiff's assertion.
5. However, even if it is the case that plaintiff did not receive defendant's motion papers until June 23, 2012, there still is ample reason for this Court to deny plaintiff's application.
6. A review of the Court's docket and defendant's notice of motion will reveal that plaintiff's opposition to defendant's motion is not due until July 31, 2012.
7. Thus, plaintiff has been provided, and there remains as of today's date, more than adequate time for plaintiff to respond to defendant's motion notwithstanding any disability that he claims to have.

WHEREFORE, your defendant respectfully requests that plaintiff's motion be denied and that the court award to defendant such other and further relief as it deems just and equitable.



Leonard A. Sclafani, Esq. (ls8306)

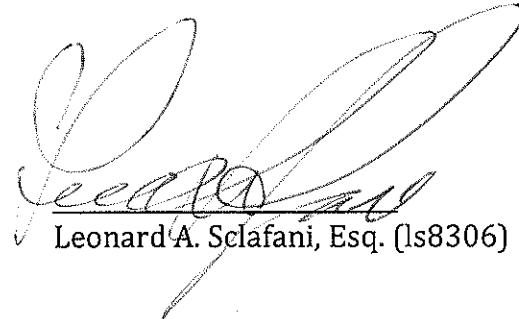
STATE OF NEW YORK, COUNTY OF NEW YORK

I, LEONARD A. SCLAFANI, an attorney duly licensed to practice before this court, affirm under penalty of perjury as follows:

I am counsel defendant, American University of Antigua, in this action.

On July 3,, 2012, I served the within Affirmation in Opposition to Plaintiff's Motion for an Extension of Time to Respond to Defendant's Motion to Dismiss on plaintiff by depositing a true copy thereof enclosed in a post paid wrapper into the care and custody of the U.S. Postal Service, all due fees prepaid and addressed to each of the following persons at the last known address set forth after each name:

Rajeev Pahuja
55 Duel Drive
Hamden, CT. 06518



Leonard A. Sclafani, Esq. (ls8306)

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

Rajeev Pahuja

Plaintiff

-against-

American University of Antigua c/o
Greater Caribbean Learning Resources,

Defendant,

X

AFFIRMATION IN OPPOSITON TO MOTION FOR EXTENSION
OF TIME TO RESPOND TO MOTION TO DISMISS

X

THE LAW OFFICES

OF

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